

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GLENN WILLIAMS, et al,)
Plaintiffs,)
v.) Case No: 20 CV 420
CITY OF CHICAGO, et al) Honorable LaShonda Hunt
Defendants.)

PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO COMPLETE CLASS DISCOVERY

NOW COMES the named Plaintiffs, individually, and on behalf of all persons similarly situated, by and through their attorneys, ALLISON K. MUTH, and ROBERT A. HOLSTEIN of HOLSTEIN & MUTH, LLC, and respectfully moves this Court to extend the time for the parties to complete class discovery. In support thereof, the Plaintiffs state as follows:

- 1.) That this Honorable Court ordered that class discovery be complete by June 26, 2023.
- 2.) That during the time in which Honorable Court granted for the parties to conduct and complete class discovery, two major events have impacted Plaintiffs' ability to timely conduct and/or review class discovery in this case. The first reason being that plaintiffs' counsels, Kenneth Flaxman and Joel Flaxman, unexpectedly motioned this Honorable Court and were ultimately given leave to withdraw their appearances by this Honorable Court on June 15, 2023. Prior to this event, Plaintiffs' attorneys Holstein and Muth believed with good faith that the co-counsels for the Plaintiffs, Joel Flaxman and Kenneth Flaxman, were handling all matters relating to the class discovery. Counsels Muth and Holstein, as of this time, do not have any

information as to the status of the class discovery due to lack of communication with noth co-counsel and opposing counsels.

3.) That counsels for the plaintiff, Allison K. Muth and Robert Holstein, as of this time, do not have the status on the class discovery that may have been conducted by prior co-counsels. Plaintiffs' counsels need additional time to review any discovery that may have been conducted, consult with opposing counsels, and/or need addional time to conduct additional class discovery.

4.) Furthermore, this case was reassigned to the Honorable LaShonda Hunt on June 15, 2023. As a result of this reassignment, Plaintiffs will be requesting that this Honorable Court conduct a review of the file and prior orders that were entered in this matter.

5.) That counsel for the plaintiffs has contacted counsels for the defendant, City of Chicago, to inquire as to whether there was an objection to this filing for a motion for an extension of time to complete class discovery. As of the time of this filing, there has been no response from the City of Chicago.

6.) That attorney Muth is out of the country until July 18, 2023, therefore, plaintiifs will there need for additional time to conduct, propound, and complete class discovery.

7.) There will not be any prejudice to the additional extension of time to conduct and complete class discovery to either party.

WHEREFORE, the Plaintiffs respectfully request that this Honorable Court grant the Plaintiffs a minimum of an additional 90 days to conduct and complete class discovery, and any other relief that this honorable Court finds just.

Date: the 26th day of June, 2023

Respectfully Submitted,

s/ Allison K. Muth

One of the Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I, Allison K. Muth, attorney for named and putative class plaintiffs, hereby certify that on Monday, June 26, 2023 I filed the above described document(s) on the CM/ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully Submitted,

s/Allison K. Muth